Message

From: Croxton, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CA7B9940863640D5B96F4295EA3C9641-CROXTON, DAVE]
Sent: 12/1/2018 12:57:25 AM
To: Fullagar, Jill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7ba061353c314b40a14a8be1ee382ae3-Gable, Jill]
Subject: only other edit on Enclosure 2

HI Jill, Document is super, thanks. Recommend one edit below.

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- *Comment 4: ODEQ*

"DEQ does not support EPA listing Oregon waters for parameters that do not have established criteria set to protect communities of marine life (aragonite saturation) or based on observations made in offshore waters outside Oregon's territorial limits or on hypothetical and untested projections into future time or at unmonitored locations. If in response to the request for information, EPA receives additional verifiable and good quality data that identifies locations in Oregon marine water with pH outside the allowable range, DEQ will incorporate new 303(d) listings identified by EPA in their final action on Oregon's 2012 303(d) list into the state's planning process for TMDL priorities."

EPA's 303(d) listing regulations found at 40 CFR 130.7(b)(3) define a "water quality standard applicable to such waters" and "applicable water quality standards" as "those water quality standards established under 303 of the Act, including numeric criteria, narrative criteria, waterbody uses, and antidegradation requirements." Interpreting narrative criteria based on data and other water quality related information is required by the CWA regulations. EPA acknowledges that the current *in situ* data indicating biological impairment to pteropods is from outside of Oregon's state waters. ~~Yet, water~~ Water chemistry data taken inside Oregon's state waters document that the aragonite saturation state conditions corrosive to pteropods outside state waters also occur in Oregon marine waters. We trust that Oregon's future research efforts in state marine waters will include pteropod